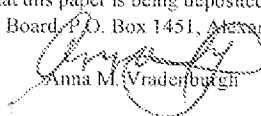


ESTTA Tracking number: **ESTTA230601**

Filing date: **08/14/2008**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91185103
Party	Defendant Adams, Tiffany
Correspondence Address	Anna M Vradenburgh, Gregory Piccionelli Piccionelli & Sarno Suite 200 2801 Townsgate Road Westlake Village, CA 91361 generalmail@piccionellisarno.com
Submission	Answer
Filer's Name	Anna M. Vradenburgh
Filer's e-mail	generalmail@piccionellisarno.com
Signature	/anna m vradenburgh/
Date	08/14/2008
Attachments	answer.pdf (4 pages)(1897653 bytes)

CERTIFICATE OF MAILING: I hereby certify that this paper is being deposited with the U.S. Postal Service as first class mail in an envelope addressed to the U. S. Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria Virginia 22313-1451:
Date: August 14, 2008 By: 

Attorney Docket No: 63288.200OPP01

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Cherokee Nation,

Opposer

v.

Tiffany Adams

Applicant

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Opposition No. 91,185,103

[Serial Nos. 78/748,323]

ANSWER TO OPPOSITION

Tiffany Adams ("Applicant") hereby pleads as follows in answer to the Notice of Opposition filed herein by Cherokee Nation ("Opposer"):

1. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 1 of the Notice of Opposition, and therefore, denies the same.
2. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 2 of the Notice of Opposition, and therefore, denies the same.
3. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 3 of the Notice of Opposition, and therefore, denies the same.
4. Applicant admits the allegation that she filed an application for registration for CHEROKEE. The specifics of the application speak for themselves and any differences, if any, between the specifics of the application and the characterization of the application by Opposer is denied. Applicant denies the remainder of the allegations of Paragraph 4 of the Notice of Opposition.

Opposition No. 91,185,103

5. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 5 of the Notice of Opposition, and therefore, denies the same.
6. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 6 of the Notice of Opposition, and therefore, denies the same.
7. Upon information and belief, Applicant denies that Opposer's marks "are exclusively associated with Opposer". Applicant is without information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 7 of the Notice of Opposition, and therefore, denies the same.
8. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 8 of the Notice of Opposition, and therefore, denies the same.
9. Applicant denies the allegations of Paragraph 9 of the Notice of Opposition.
10. Applicant denies the allegations of Paragraph 10 of the Notice of Opposition.
11. Applicant denies the allegations of Paragraph 11 of the Notice of Opposition.
12. Applicant does not understand "including innuendo" and thus, is without information sufficient to form a belief as to the truth of this allegation of Paragraph 12 of the Notice of Opposition, and therefore, denies the same. Applicant denies the remaining allegations of Paragraph 12 of the Notice of Opposition.
13. Applicant does not understand "including innuendo" and thus, is without information sufficient to form a belief as to the truth of this allegation of Paragraph 13 of the Notice of Opposition, and therefore, denies the same. Applicant denies the remaining allegations of Paragraph 13 of the Notice of Opposition.
14. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 14 of the Notice of Opposition, and therefore, denies the same.

Opposition No. 91,185,103

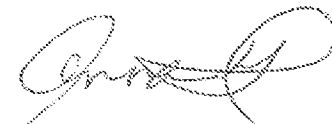
15. Applicant is without information sufficient to form a belief as to the truth of the allegations of Paragraph 15 of the Notice of Opposition, and therefore, denies the same.
16. Applicant denies the allegations of Paragraph 16 of the Notice of Opposition.
17. Applicant denies the allegations of Paragraph 17 of the Notice of Opposition.
18. Applicant is without information sufficient to form a belief as to the truth of the allegation of Paragraph 18 of the Notice of Opposition regarding Opposer's belief "that it will be damaged", and therefore, denies the same. Applicant denies the remaining allegations of Paragraph 18 of the Notice of Opposition.

Affirmative Defenses

19. Opposer's use of the alleged marks is a merely descriptive or generic use as admitted in Paragraph 2 of the Notice of Opposition.

Respectfully submitted,

Date: August 14, 2008



Anna M. Vradenburgh
Gregory A. Piccionelli
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Westlake Village, California 91361
Telephone: (805) 497-5886
Facsimile: (805) 497-7046

Attorneys for Applicant

AMV/

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA

I am employed in the County of Ventura, State of California. I am over the age of 18 years and am not a party to the within action. My business address is 2801 Townsgate Road, Suite 200, Westlake Village, California 91361.

On August 14, 2008, I served the following document(s) described as Answer on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

Anthony J. Jorgenson
Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C.
320 South Boston Avenue, Suite 200
Tulsa, OK 74103

☒ BY MAIL: I caused such envelope to be deposited in the mail at Westlake Village, California. I am "readily familiar" with the office's practice of collection and processing correspondence for mailing. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

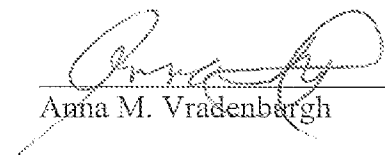
☐ BY PERSONAL SERVICE: I delivered such envelope by hand to the offices of the addressee(s) listed above.

☐ BY FACSIMILE: I caused the above document(s) to be transmitted to the office of the addressee(s) listed above.

☐ BY EXPRESS MAIL: I caused the document(s) to be delivered by overnight Express Mail via the United States Postal Service "Express Mail Post Office to Addressee" to the addressee(s) listed above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 14, 2008, at Westlake Village, California.



Anna M. Vradenbergh